

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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*Southern District of New York  
Jennifer L. Brown  
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May 9, 2022

VIA ECF AND E-MAIL

The Honorable Cathy Seibel  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

The sentencing for both Defendants is adjourned to 8/31/22 at 9:30 am. The Clerk of Court is respectfully directed to send a copy of this endorsement to Defendant Saaed Moslem at the Westchester County Jail and to update the docket to reflect that he is now representing himself.

SO ORDERED.

Re: *United States v. Mehdi Moslem*, 19-cr-00547-1 (CS)

  
CATHY SEIBEL, U.S.D.J.

5/13/22

Dear Honorable Judge Seibel:

I am writing regarding the above captioned matter to request an adjournment of the sentencing currently scheduled for May 25, 2022, at 2:30 p.m.

As the Court likely recalls, our office was appointed to represent Mr. Moslem in March 2022 at his sentencing and Jason Ser was assigned to represent him. Mr. Ser left the Federal Defender's Office in April 2022. His replacement, Rachel Martin, will be taking over this case. She does not start with our office until June 6, 2022. In addition to onboarding, Mr. Martin will require time to familiarize herself with the case, the trial transcripts, meet Mr. Moslem, and prepare a sentencing submission. Therefore, I am respectfully requesting that Mr. Moslem's sentencing be adjourned to a date in August 2022 so that she may accomplish those tasks.

I have spoken to the Government through Assistant United States Attorney Nick Bradley. He does not oppose our request. However, he believes it will likely be necessary at sentencing to conduct a *Fatico* hearing. Since a great deal of the evidence required for that hearing would likely also apply to Mr. Moslem's co-defendant, Saaeh Moslem, the Government is requesting that the sentencing dates for both defendants be moved as to avoid conducting duplicate hearings.

I reached out to standby counsel for Mr. Saaeh Moslem, Lawrence Sheehan, on May 1, 2022. He reached out to his client to ascertain his position on this request, but, as of the filing of this letter, has not received a reply. As the sentencing date is quickly approaching, I wanted to bring this issue to the Court's attention.

I respectfully request that the Court grant this request to move Mr. Moslem's sentencing date to a date in August 2022.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth K. Quinn", with a long horizontal flourish extending to the right.

Elizabeth K. Quinn  
Assistant Federal Public Defender

cc: AUSAs Nicholas Bradley and Daniel Loss (via e-mail)  
Lawrence Sheehan